



Sandra Bron <Sandra.Bron@epa.state.il.us> on 09/07/2001 11:49:43 AM

To: KEVIN TURNER cc: Mike Ribordy, Terry Ayers
Subject: Sauget Area 1 Sediment Removal Sampling Program

Kevin,

It was good to meet with you yesterday. Here are my comments on the Sauget Post Removal Sampling Requirements--Request for Change, submitted by Solutia on August 20, 2001. I will try to formalize this in a hard-copy letter version next week.

Based on my observations of creek sediment removal to date, the UAO post-removal sampling requirement of the creek channel from Sectors B through E, i.e., every 100 feet, 3 samples per transect, is overly conservative because it appears that on a visual basis the sediment is being completely removed. Under the UAO sampling protocol, sampling of Sectors B through E would require 255 samples. Based on our conversation yesterday, sediment removal at Creek Sector F is included in a modification to the UAO, which would mean an additional 195 samples if the current sampling protocol were followed, or a total of 450 samples for Sectors B through F. It thus appears that some relief from the sampling requirement is warranted.

On the other hand, Solutia's proposal for reduced sampling does not appear justified in its entirety. Solutia is proposing only 22 samples for broad scan analysis, and 63 samples for PCBs, copper, and zinc, over the entire length of Sectors B through F, for a total of 15,000 linear feet of creek bed. Solutia did not submit technical justification for performing the broad scan analysis at a reduced frequency as compared to PCBs, copper and zinc. Solutia did not submit technical justification for performing analysis of PCBs, copper, and zinc at each transect. In addition, there is no justification for increasing the transect distance in the lower portion of the creek, Segments E and F. The purpose of the sampling is to verify sediment removal, which is not dependent on the distance downstream.

I recommend sampling all Segments (B through F) on a 100 or 150 foot transect. At each transect, composite three aliquots as proposed by Solutia. Analyze each sample for the entire list of parameters as required by the UAO. If a 100 foot transect were used, the total samples required would be 150. If a 150 foot transect were used, the total samples required would be 100. Both represent a significant reduction in the sampling requirement (450 vs. 100 or 150 samples), while at the same time the transect interval and sampling results will verify sediment removal.

Please feel free to contact me 217/557-3199 if you have any comments or questions on the above.

*NO Sampling until after Sediment
Removal is done?*

EPA Region 5 Records Ctr.



226617